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**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268**

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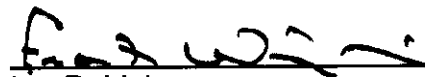
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Docket No. MC98-1

**PITNEY BOWES INTERROGATORIES
TO USPS WITNESS SECKAR
(PB/USPS-T2-3-4)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, Pitney Bowes Inc. ("PB") hereby propounds the attached interrogatories and requests for the production of documents. The instructions for responding contained in the First Set of Interrogatories of Pitney Bowes Inc. to USPS Witness Plunkett are incorporated by reference.

Respectfully submitted,

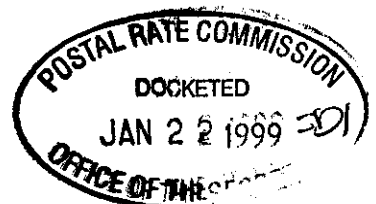


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DC1:87649



- PB/USPS-T2-3 The source notes for rows 2, 10 and 18 of page 1 of Worksheet 1 of the Attachment to your updated response to November hearing question (the three categories of maintenance costs) indicate that the costs are derived from Table 12. The maintenance numbers that you present in rows 2, 10, and 18 are different from those in Table 1 (as revised July 23, 1998) of Exhibit A to your testimony. We are not aware of any updating of Table 12 of Exhibit A to your testimony. If there is one, please provide it and if there is not, please provide the derivation of the maintenance cost numbers that you now believe current.
- PB/USPS-T2-4 Please confirm that the 1999-2000 average variable information system costs as reported in the July 23 revision to USPS-T-2 Exhibit A in Table 1 (\$0.0007) have increased to \$0.0021 as reported in Worksheet 1 to the Attachment to your updated response to the question posed by the Presiding Officer at Tr. 7/1733-34. If you can not confirm, please disclose the July 23 and current average variable information costs.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: January 22 1998

Ian D. Volner
Ian D. Volner